



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
REGION 4  
ATLANTA FEDERAL CENTER  
61 FORSYTH STREET  
ATLANTA, GEORGIA 30303-8960

June 23, 2014

Mr. Mike Spaits  
Eglin AFB Public Affairs Office  
96 TW/ PA  
101 West D Avenue, Room 238  
Eglin AFB, FL 32542-5499

**Subject:** EPA's Comments on the Draft Environmental Impact Statement (DEIS) for the proposed Gulf Regional Airspace Strategic Initiative (GRASI) Landscape Initiative at Eglin Air Force Base, Florida. CEQ No. 20140139

Dear Mr. Spaits:

Pursuant to Section 309 of the Clean Air Act (CAA) and Section 102(2)(C) of the National Environmental Policy Act (NEPA), the U.S. Environmental Protection Agency (EPA), Region 4 reviewed the Draft Environmental Impact Statement (DEIS) for the proposed Gulf Regional Airspace Strategic Initiative (GRASI) Landscape Initiative at Eglin Air Force Base, Florida.

This DEIS is the result of the Gulf Regional Airspace Strategic Initiative (GRASI) region that consists of the eastern Gulf of Mexico region, which includes northwest Florida, southern Mississippi, lower Alabama, southern Georgia, and the eastern Gulf of Mexico. The GRASI is a collaborative planning effort between military and civilian leaders designed to ensure the future availability and capacity of regional airspace and training lands for military use and the continued economic prosperity of the Gulf coast. The GRASI Landscape Initiative (GLI) is a U.S. Air Force-led partnership with the State of Florida and federal agencies to expand the capacity of the region to safely host military test and training operations. This DEIS addressed locations in the Blackwater River State Forest (BRSF) and Tate's Hell State Forest (THSF) for general training operations, as well as small, noncontiguous land areas throughout the region for permanent and mobile radar emitter sites.

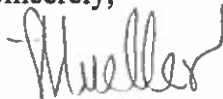
The EPA has reviewed the potential environmental impacts resulting from the implementation of the GRASI Landscape Initiative (GLI) in the region of northwest Florida. Based on the information provided in the DEIS, It appears that you have addressed our primary concerns for significant adverse impacts to public health and safety. The general protection levels for the proposed action ground operations provides adequate environmental resource protection.

In summary, EPA has no immediate environmental concerns regarding this project, as proposed, and rates this draft EIS as LO (Lack of Objections) (i.e. the review has not identified any potential environmental impacts requiring substantive changes to the preferred alternative).

EPA also supports a comprehensive monitoring program to ensure that the ongoing impacts from military training are assessed and appropriately addressed/mitigated once identified. In additions, the general protection levels identified in the draft EIS should be applied and adequately enforced to attain appropriate results. Please provide us with a copy of the Record of Decision (ROD) when available.

We recommend that you continue to keep the community informed on the status of the GRASI Landscape Initiative. We appreciate your coordination with us. If you have any questions, please contact Larry Gissentanna of my staff at 404-562- 8248 ([gissentanna.larry@epa.gov](mailto:gissentanna.larry@epa.gov)).

Sincerely,

A handwritten signature in dark ink, appearing to read "Mueller", with a stylized flourish at the end.

Heinz J. Mueller, Chief  
NEPA Program Office  
Office of Environmental Accountability

## **U.S. ENVIRONMENTAL PROTECTION AGENCY ENVIRONMENTAL IMPACT STATEMENT (EIS) RATING SYSTEM CRITERIA**

EPA has developed a set of criteria for rating Draft EISs. The rating system provides a basis upon which EPA makes recommendations to the lead agency for improving the draft.

### **RATING THE ENVIRONMENTAL IMPACT OF THE ACTION**

- **LO (Lack of Objections):** The review has not identified any potential environmental impacts requiring substantive changes to the preferred alternative. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposed action.
- **EC (Environmental Concerns):** The review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact.
- **EO (Environmental Objections):** The review has identified significant environmental impacts that should be avoided in order to adequately protect the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). The basis for environmental objections can include situations:
  1. Where an action might violate or be inconsistent with achievement or maintenance of a national environmental standard;
  2. Where the Federal agency violates its own substantive environmental requirements that relate to EPA's areas of jurisdiction or expertise;
  3. Where there is a violation of an EPA policy declaration;
  4. Where there are no applicable standards or where applicable standards will not be violated but there is potential for significant environmental degradation that could be corrected by project modification or other feasible alternatives; or
  5. Where proceeding with the proposed action would set a precedent for future actions that collectively could result in significant environmental impacts.
- **EU (Environmentally Unsatisfactory):** The review has identified adverse environmental impacts that are of sufficient magnitude that EPA believes the proposed action must not proceed as proposed. The basis for an environmentally unsatisfactory determination consists of identification of environmentally objectionable impacts as defined above and one or more of the following conditions:
  1. The potential violation of or inconsistency with a national environmental standard is substantive and/or will occur on a long-term basis;
  2. There are no applicable standards but the severity, duration, or geographical scope of the impacts associated with the proposed action warrant special attention; or
  3. The potential environmental impacts resulting from the proposed action are of national importance because of the threat to national environmental resources or to environmental policies.

### **RATING THE ADEQUACY OF THE ENVIRONMENTAL IMPACT STATEMENT (EIS)**

- **1 (Adequate):** The Draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.
- **2 (Insufficient Information):** The Draft EIS does not contain sufficient information to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the Draft EIS, which could reduce the environmental impacts of the proposal. The identified additional information, data, analyses, or discussion should be included in the Final EIS.
- **3 (Inadequate):** The Draft EIS does not adequately assess the potentially significant environmental impacts of the proposal, or the reviewer has identified new, reasonably available, alternatives, that are outside of the spectrum of alternatives analyzed in the Draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. The identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. This rating indicates EPA's belief that the Draft EIS does not meet the purposes of NEPA and/or the Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised Draft EIS.